

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-
GUERRA, MICHAEL MAERLENDER, BRANDON
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY
TATIANA WEAVER, and CAMERON WILLIAMS,
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE
OF TECHNOLOGY, UNIVERSITY OF CHICAGO,
THE TRUSTEES OF COLUMBIA UNIVERSITY IN
THE CITY OF NEW YORK, CORNELL
UNIVERSITY, TRUSTEES OF DARTMOUTH
COLLEGE, DUKE UNIVERSITY, EMORY
UNIVERSITY, GEORGETOWN UNIVERSITY, THE
JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS
INSTITUTE OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME DU
LAC, THE TRUSTEES OF THE UNIVERSITY OF
PENNSYLVANIA, WILLIAM MARSH RICE
UNIVERSITY, VANDERBILT UNIVERSITY, and
YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125

Hon. Matthew F. Kennelly

**[PROPOSED] ORDER REGARDING PLAINTIFFS' MOTION TO DESIGNATE
GEORGETOWN'S PRESIDENT AND HIS ASSISTANT AS CUSTODIANS AND TO
COMPEL GEORGETOWN TO PRODUCE DOCUMENTS**

Upon consideration of Plaintiffs' Motion and supporting Memorandum, the Court enters
the following order:

1. Defendant Georgetown will designate President John DeGioia and Assistant to the President Andrew Koenig of the President's Office as custodians for the search for and production of:

- a. Every document, email, record or other written communication ("Record") concerning: (1) the nomination, recommendation, suggestion, or sponsorship of an individual for admission to Georgetown ("Sponsor-Related Communications"), with respect to any individual who was ultimately included on a President's List ("President's List Applicant"), including any response to or Record concerning any such Communication; (2) any President's List Applicant who is the subject of any Sponsor-Related Communication; (3) any donor or prospective donor who is a family member of any President's List Applicant ("Applicant-Interested Donor"), or any Record to or from such Donor; and (4) any actual or potential pledge agreement or other agreement to donate funds to Georgetown by any Applicant-Interested Donor. As used herein, the term President's List Applicant does not include any children or grandchildren of Georgetown administrators or faculty members.
- b. Every Record (including but not limited to memoranda, guidelines, and checklists) written, maintained or otherwise created by the President, his Office or Office personnel concerning: (1) the reason(s) why applicants for admission are or have been included on the President's List; (2) the practices or policies of Georgetown or the President's Office concerning the inclusion of applicants on the President's List based on the donation history or capacity of an applicant's family.

2. The documents described in Paragraphs 1 herein do not include: (1) PL Excel Files or spreadsheets previously produced to Plaintiffs under the Court's August 30 Order (ECF 437); and (2) other substantially similar Excel files or spreadsheets.

3. With respect to any Excel files, spreadsheets or similar documents included in the "PL Excel Files" or "Advancement Documents" referenced in the Aug. 30 Order, Georgetown will, through its counsel and in good faith, respond to written and oral questions (including reasonable follow-up questions) from Plaintiffs' counsel concerning the understanding and interpretation of those materials.

4. The production described in Paragraph 1 shall be concluded by December 8, unless the parties agree otherwise in writing.

SO ORDERED:

Dated: _____

Hon. Matthew F. Kennelly
United States District Judge